



Planning Statement

71 AND 72 RUSSELL SQUARE (PRESIDENT HOTEL), LONDON,
WC1B 5BA

MAY 2016

COLLIERS INTERNATIONAL

ON BEHALF OF

IMPERIAL LONDON HOTELS LTD

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1 INTRODUCTION

1.1 THE PROPOSED DEVELOPMENT

This Statement has been prepared to support a Full Planning Application, made by Colliers International on behalf of Imperial London Hotels Ltd, in regard to their ancillary retail units at 71 and 72 Russell Square, President Hotel, WC1B 5BA. The proposed unit most recently operated as Ionic Hairdressers and Herbal Express.

The proposal seeks to implement a change of use of the hotel's ancillary retail units to create a single retail unit (Class A1 use) which will operate independently from the hotel.

1.2 PURPOSE OF STATEMENT

This Statement assesses the proposed development in light of relevant planning policy, guidance and other material considerations. The report is structured such that it establishes this position through the following sections:

- Section 2 - consideration of the site location and context;
- Section 3 - an analysis of the property's planning history;
- Section 4 - identification of the relevant adopted and emerging development plan policies;
- Section 5 - assessment of the proposal against planning policies and;
- Section 6 - conclusions

This Statement should be read in conjunction with the other application documents submitted in support of this application which are listed on the covering letter.

2 SITE CONTEXT

The application site forms part of the President Hotel, an eight storey hotel in the London Borough of Camden. The hotel fronts the north eastern side of Russell Square and Guilford Street (B502). The proposed unit is located on the ground floor, fronting Russell Square, in a row of existing retail frontages along Russell Square.

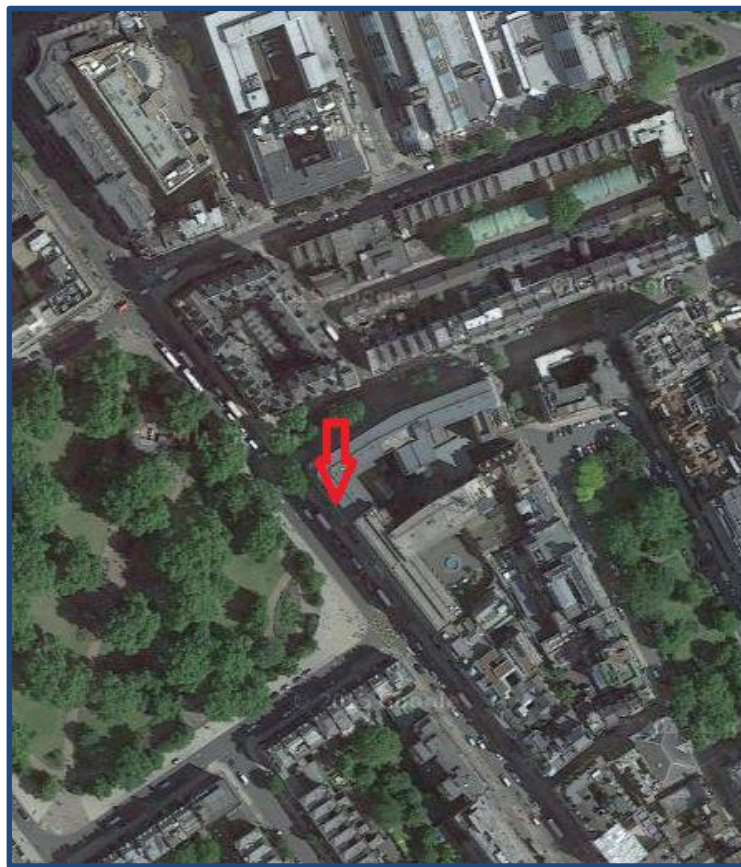


Figure 2.1: Site Location Plan

2.1 EXISTING USE

The existing hotel retail units are situated at ground floor level. The units are both currently vacant having recently been operational as a hairdressers and a shop unit.

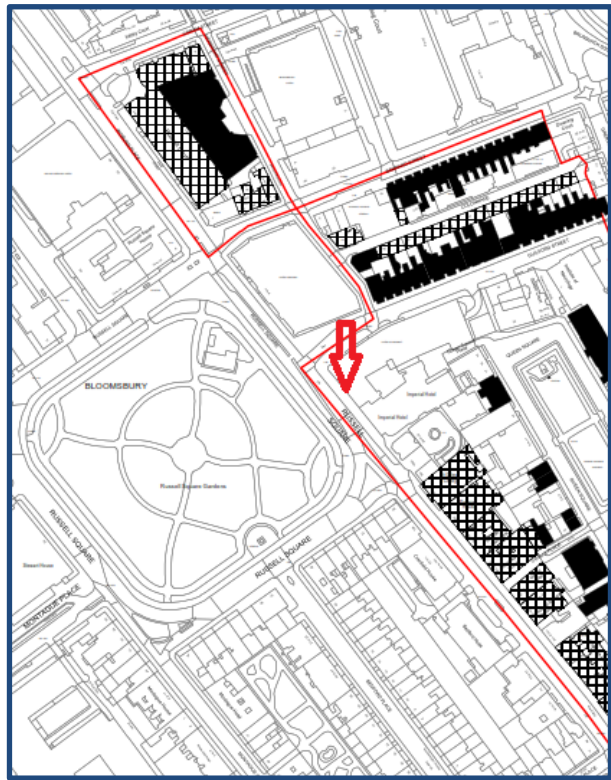
2.2 SURROUNDING CHARACTER

The property is located within a highly accessible location and has a PTAL rating of 6b. Russell Square tube station (Piccadilly line) is situated 150m to the north, Holborn tube station is located 650m to the south, whilst the rail and tube (Northern and Victoria lines) services of Euston station are approximately 1km to the north. There are also numerous bus routes along Russell Square.

The Bloomsbury area is characterised by a mix of active uses at ground floor level, including hotels, shops, restaurants and cafes.

2.3 HERITAGE DESIGNATIONS

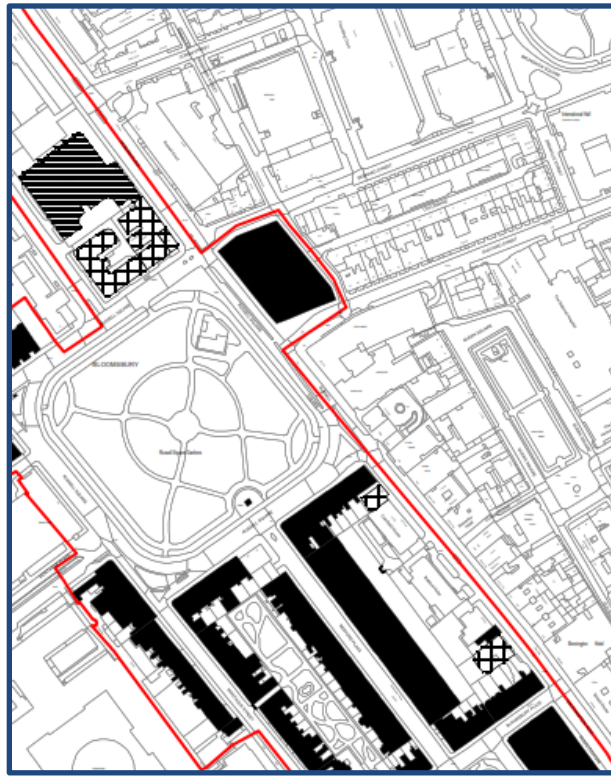
The property falls within the Bloomsbury Conservation Area (sub area 11), the extent of which is shown in Figure 2.3. The location of the site is identified with a red arrow. The President Hotel is not a listed building, nor are the buildings immediately adjacent.



Bloomsbury Sub Area 11

- Listed Building
- Positive Building
- Sub Area 11

Figure 2.3: Bloomsbury Conservation Area Sub Area 11



Bloomsbury Sub Area 6

- Listed Building
- Positive Building
- Negative Building
- Sub Area 6

Figure 2.4: Bloomsbury Conservation Area Sub Area 6

3 PLANNING HISTORY

Colliers International has reviewed the site's online planning history register maintained by the LB of Camden, which comprises a record of planning applications and decisions. The content and accuracy of the planning register is the responsibility of the Council, but is considered sufficient to reach accurate conclusions in respect of the property.

3.1 PLANNING HISTORY

A number of planning history records exist for the President Hotel with a smaller number of records directly relating to the properties 71 and 72 Russell Square. We are of the opinion that the existing lawful use of the units at the President Hotel is as a 'Hotel' under Class C1 of the *Town and Country Planning (Use Classes) Order 1987* (as amended).

A comprehensive planning history schedule is attached at Appendix 1.

4 PLANNING POLICY

This section identifies the planning policy context against which applications within the LB Camden will be determined, with regard to both adopted and emerging policy. Key material considerations are also identified.

The relevant policies, together with an analysis of how the proposed scheme responds to these policies, are set out in Section 5.

4.1 PLANNING POLICY CONTEXT

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires that decisions made under the Planning Acts are determined in accordance with the development plan unless other material considerations indicate otherwise.

National Planning Policy

The National Planning Policy Framework (NPPF) was published in March 2012. It replaced the suite of previous Government guidance comprising Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) with a single consolidated document. The NPPF provides the framework within which Local Authorities should prepare policy and determine applications, including further definition of sustainable development. It is therefore an essential decision-making tool.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking (paragraph 14). This paragraph goes on to state that:

“For decision taking this means:

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.”*

In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is also a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of practice guidance at the national level.

Local Development Plan

The relevant development plan in this case comprises:

- Further Alterations to the London Plan (2015);
- LB Camden Core Strategy (2010);
- LB Camden Development Policies (2010); and
- LB Camden Site Allocations (2013).

The site is not located within a designated neighbourhood planning area.

4.2 THE LONDON PLAN

Policy 2.15 supports the provision of a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan.

Policy 4.5 applies to London's visitor infrastructure and states that, strategically, the visitor economy should be supported. Development decisions should not result in the loss of strategic hotel capacity.

Policy 4.7 applies a town centre first approach to retail and leisure development and requires an impact assessment.

Policy 4.8 requires a proactive approach to planning for retail and related services. It requires local policies to provide a framework for maintaining,

managing and enhancing local and neighbourhood shopping which provide local services. The supporting justification text acknowledges that larger centres are appropriate to accommodate much of the comparison goods growth and smaller scale centres convenience shopping growth, it is important to provide local shops and services to secure lifetime neighbourhoods (paragraph 4.48).

4.3 LOCAL CAMDEN POLICIES

The extract from Camden’s Planning Proposals Map below confirms that the site is in the Holborn Growth Area, Bloomsbury Conservation Area and the Central London Area. The property is also located within the Central Activities Zone.








-  Designated View
-  5A.2 Greenwich Park Wolfe statue to Tower Bridge - Right Lateral Assessment Area
-  Central London Area
Central London Area (Clear Zone Region) CLA
-  Conservation Area
Bloomsbury
-  Growth Area
Holborn

Figure 4.1: Proposals Map Extract

i) Core Strategy

Policy CS1 sets out the strategy for growth within the Borough, focussing it in the most suitable locations, particularly at King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead. Elsewhere it will be promoted at highly accessible locations, in particular Central London and the defined town centres. Camden will seek the most efficient use of land and buildings, including a mix of uses.

Policy CS2 identifies the defined growth areas as the locations where development in Camden will be focussed. Development in the growth areas should maximise site opportunities and follow the Council's aspirations and objectives for that area, including the provision of jobs and facilities. Holborn is defined as a predominantly commercial area.

The Core Strategy, through Policy CS7, seeks to direct retail growth to the growth areas, Central London Frontages and designated centres. In the Holborn Growth Area the Council seek to encourage ground floor retail uses and create a more cohesive local shopping and service area. Policy CS8 details the Council's desire to secure a strong economy in Camden and recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

Policy CS9 seeks to achieve a successful Central London. The policy outlines the Council's intention to preserve the area's historic environment and support Central London as a focus for shops and other uses.

ii) Development Policies Document

Policy DP14 of the Development Policies Document seeks to protect existing visitor accommodation in appropriate locations; Central London is considered an appropriate location (paragraph 14.6).

Policy DP25 outlines the Council's approach to conserving Camden's heritage. The Council will only permit development within a conservation area that preserves and enhances the character and appearance of the area.

iii) Site Allocations Document

This document describes Bloomsbury as an area characterised by Georgian squares and residences, many of which are now in commercial use. The policy approach is in line with the Core Strategy aspirations for Central London and seeks:

“a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street”.

The subject property does not have a site allocation nor is it located near any sites with an allocation.

iv) Camden Local Plan Submission Draft 2015

The emerging development plan for the area is contained within the Camden Local Plan Submission Draft. Consultation on the Local Plan Submission Draft closed on 4th April 2016. This document sets out the strategic policies for Camden and repeats the policies of relevance to this application outlined in the existing Core Strategy and Development Policies Document. No minor amendments are deemed to be of significance to this application.

v) Camden Retail Survey 2015

Camden's Retail Survey 2015 records street uses throughout the borough. The entries for the units 71 and 72 Russell Square record the uses as Class A1 (Shops). Figure 4.2 shows the interactive map survey for the application premises.

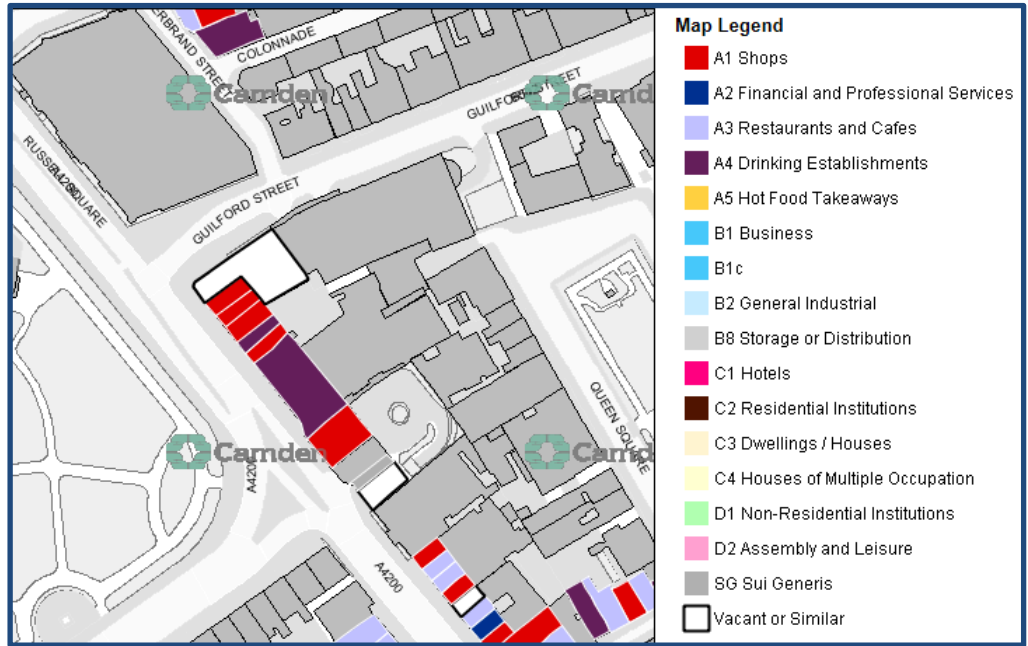


Figure 4.2: Camden Retail Survey 2015

5 PLANNING ASSESSMENT

This section provides an assessment of specific considerations in respect of the proposed development. In doing so, it draws upon the key issues identified in the review of policy and assesses the scheme against the following elements:

- Loss of Class C1 use;
- Impact of proposed Class A1 use;
- Sequential Assessment;
- Operational considerations;
 - Opening hours
 - Servicing
 - Waste management
 - Fire escape

Following a review of the planning policy context it is considered that the primary consideration in the determination of this application is the loss of hotel floorspace and the proposition of a Class A1 use. Each aspect is discussed below:

5.1 LOSS OF CLASS C1 (HOTEL) USE

The proposed unit currently exists as two separate ground floor retail units, each of approximately 43sqm, located within the floorplate of the President Hotel. The unit is currently operated as part of the hotel. The units benefit from direct access from Russell Square and are also accessible from internal entrances to the rear. One of these internal entrances is to be removed following the change of use of the unit.

In its current use, the proposed unit provides no contribution to bedroom space and the independent unit will continue to be available to custom from guests of the hotel due to its close proximity. Importantly, the proposal will result in no net loss of visitor accommodation floorspace or affect the on-going operations of the hotel.

5.2 PROPOSED CLASS A1 (SHOPS) USE

The unit is currently operational as two retail units demonstrating existing entrances fronting the public highway. The proposal will see the unit operate independently of the hotel with a minor internal alteration to remove a single point of access from the rear of the unit. Whilst part of the hotel, the units currently operate in a very similar manner to an independent Class A1 unit.

Access to the unit will be through the two existing entrances fronting Russell Square and a single point of access from the hotel ground floor. The creation of a larger, single retail unit will provide a higher quality unit to attract a future tenant and will contribute to increased vitality along the Russell Square frontage. No external alterations or signage are included as part of this application.

5.3 SEQUENTIAL ASSESSMENT

Camden Planning Guidance 5 – Town Centres, Retail & Employment (2013) states that locations considered appropriate for retail uses are defined in Core Strategy Policy CS7. A sequential assessment is required where new retail uses are proposed outside of the areas listed in Policy CS7.

The site is located in the Holborn Growth Area and a sequential assessment is not therefore necessary.

5.4 OTHER CONSIDERATIONS

- **OPENING HOURS**

The unit at 71 Russell Square most recently operated from 09:00 – 18:30 (Monday – Saturday). The unit at 72 Russell Square most recently operated from 10:30 – 20:00 Monday – Friday, 10:30 – 19:00 on Saturday and 12:00 – 18:00 on Sunday. The proposed opening hours of the unit will be 08:00 – 20:00 (Monday – Saturday) and 09:00 – 17:00 (Sunday).

- **SERVICING**

The unit is currently serviced as part of the wider hotel. The independent unit will be serviced through the front entrance.

- **WASTE MANAGEMENT**

Refuse/ recycling from the unit will be stored in the unit before being collected in accordance with local loading restrictions.

- **FIRE ESCAPE**

The unit will be served by existing means of exit through the two doors fronting Russell Square and a single door to the rear of the unit.

6 SUMMARY AND CONCLUSIONS

This Statement is submitted in support of an application for Full Planning Permission, made by Colliers International on behalf of Imperial London Hotels Ltd, with regard to the properties at 71 and 72 Russell Square (President Hotel).

The proposed development is described as:

“Change of use from ancillary retail units (Class C1) to independent Class A1 (Shops) unit”

The proposed unit is currently operational as two ancillary retail units within the floorplate of the President Hotel. The units front the public highway and attract passing trade from Russell Square whilst also having access from the ground floor of the President Hotel. The creation of an independent unit will serve to provide a larger, higher quality retail offering and is in-keeping with the mix of ground floor uses along Russell Square and the surrounding Bloomsbury area.

The creation of a unit separate to the hotel will enable a specialist operator to locate in the area and operate independently from the hotel. The proposed use is appropriate in this location, contributing to the vitality of the area and continuing to serve the local catchment in addition to guests of the hotel. In this respect, whilst a new independent unit will be created, the function will not change significantly.

In conclusion, the proposals are compliant with national and local policy and will make a positive contribution to the character and appearance of the conservation area.

APPENDIX 1 – PLANNING HISTORY

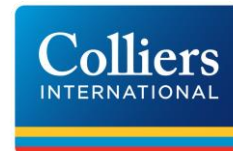
71 and 72 Russell Square

Application Reference	Date of Application	Description of Development	Date of Decision	Decision
CA.1698 (71 Russell Square)	22/11/1968	to the display of a single sided fascia box sign, with internal static illumination at 71 Russell Square, W.C.1.	19/02/1969	Permission Granted
CA.1759	14/03/1963	to a display of individual built up letters, with internal static illumination across the fascia at 72 Russell Square.	05/04/1963	Permission Granted

President Hotel

Application Reference	Date of Application	Description of Development	Date of Decision	Decision	Comments
9501343R1	06/03/1996	Installation of ATM 5684 through existing glazed elevation, as shown on drawing number 1316/1A.	29/03/1996	Grant Full Planning Permission.	
9580143	27/07/1995	Display of an internally illuminated ATM machine sign, as shown on drawing number 1316/1A	29/03/1995	Grant Advertisement Consent	ATM on Barclays Bank Russell Square frontage.
8703678	19/11/1987	Extension to hotel reception area involving redesign and resurfacing of taxi run-in closure of existing car park exit and reopening of disused spiral exit to Guilford Street as shown on drawing numbers 509/4/20G 509/3/02 03 and 07 unnumbered sketch and unnumbered photographs.	21/01/1988	Grant Planning Permission with conditions.	
8701952	18/06/1987	Single storey conservatory restaurant extension in rear service yard and change of use of ground floor retail unit to hotel access to Russell Square as shown on drawings numbered 509/4/02F and 509/2/33.	23/09/1987	Grant Planning Permission with conditions.	
8701091 (President and Imperial Hotels)	20/05/1987	Refurbishment of whole ground floor facade to Russell Square elevation of existing hotels as shown on drawings numbered 509/4/02E and 03	21/08/1987	Grant Planning Permission with conditions.	Informative 1: The submitted plans show the creation of a new shop unit although the application forms indicate that no change of use is involved. This will only be so if any space not previously in a retail use unrelated to the hotel is to be used for a retail purpose ancillary to or forming

					part of the hotel use.
8501234	24/07/1985	Formation of new entrance to carver restaurant. ^As shown on drawings numbered 44A 467-1 & 467-2).	07/08/1985	Grant Planning Permission	
CTP/M14/24 /B/35307	22/11/1982	The installation of new shop-fronts to Russell Square and Guilford Street including the installation of a "Barclay-Bank" machine.	10/02/1983	Grant Planning Permission with conditions	
CTP/M14/24 /B/33722	16/02/1982	The erection of a ground floor extension to the bank over the hotel car park exit ramp and the change of use of part of the ground floor of the hotel and of one retail unit adjacent to the bank to use for banking purposes.	14/06/1982	Refusal	
CTP/M14/24 /B/23188	30/07/1976	Change of use of ground floor annexe from shop to office for banking purposes, for use as a small sub-branch.	17/09/1976	Grant Planning Permission with conditions	Permission for the corner unit fronting Russell Square and Guilford Street. Now occupied by Pret a Manger.
	21/1/1960	Erection of a hotel building at 67/73 Russell Square, 52/60 Guilford Street and 20/22 (Queens Square)			



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